

1 ROBERT E. ATKINSON, ESQ.
 2 Nevada Bar No. 9958
 3 Email: robert@nv-lawfirm.com
 4 **KUPPERLIN LAW GROUP, LLC**
 5 8965 S Eastern Ave, Suite 350
 6 Las Vegas, NV 89123
 Telephone: (702) 614-0600
 Facsimile: (702) 614-0647
[Proposed] Attorney for Chapter 11 Trustee

E-FILED: December 26, 2012

7 **UNITED STATES BANKRUPTCY COURT**
 8 **DISTRICT OF NEVADA**

9 In re:

10 CALDERA P & G,

11 Debtor.

12 Case No. 12-22484-lbr
 Chapter 11

13 **DECLARATION OF ROBERT
 14 ATKINSON, ESQ. IN SUPPORT OF EX
 PARTE APPLICATION TO EMPLOY
 COUNSEL**

15 Hearing Date: N/A
 Hearing Time: N/A

16 I declare under penalty of perjury that the assertions of this statement are true and
 17 correct to the best of my information, knowledge and belief:

18 1. I am an attorney licensed to practice in Nevada, and am the sole member of
 19 Kupperlin Law Group, LLC (the "Firm").

20 2. I personally inspected the Debtor's petition, corporate ownership statement,
 21 and creditor mailing matrix, and performed a conflicts check.

22 3. The Firm does not hold or represent an interest adverse to the Debtor's estate,
 23 and is a disinterested person as defined in 11 U.S.C. §101(14) in that the Firm:

- 24 a) Is not a creditor, an equity security holder, or an insider of the Debtor;
- 25 b) Is not and was not, within 2 years before the date of the filing of the
 26 petition, a director, officer, or employee of the debtor;

1 c) Does not have an interest materially adverse to the interest of the estate or
2 of any class of creditors or equity security holders, by reason of any direct
3 or indirect relationship to, connection with, or interest in, the debtor, or for
4 any other reason.

5 4. As a matter of full disclosure, in unrelated bankruptcy cases the Firm and its
6 attorneys have historically: (i) represented debtors in which the Trustee happened to be the
7 court-appointed panel trustee for that case, and (ii) in yet other cases, represented the
8 Trustee as his attorney for those cases. However, because these other cases are, to the best
9 of my knowledge, unrelated to this present above-captioned bankruptcy case, the Firm does
10 not hold any interest materially adverse to the interest of the estate in this case.

11 5. Subject to Court approval and in accordance with 11 U.S.C. §§330(a) and
12 331, the Firm will seek payment for compensation on the following fee structure: \$400 for
13 attorneys, \$260 for paraprofessionals (employees who have a J.D. degree but are not yet
14 licensed in Nevada), and \$120/hour for paralegals.

15 6. The Firm will also seek reimbursement of actual, necessary expenses. The
16 Firm's standard policy regarding expenses is to charge its clients for expenses incurred in
17 connection with the client's case, at no markup. These expenses and charges include mail
18 and express mail charges, hand delivery, overnight delivery, and other runner/delivery
19 charges, out-of-town travel expenses (if necessary), transcription costs, photocopying
20 charges, and court filing fees.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 DATED 12/26/12

23 
24 Robert Atkinson, Esq.
25 Nevada Bar No. 9958